

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:23-CR-00562 RLW JSD
	)	
ANDREW C. HUBBARD,	)	
	)	
Defendant.	)	

**SUPPLEMENTAL MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Ashley M. Walker, Assistant United States Attorney for said District, and moves the Court to order Defendant Andrew C. Hubbard detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Title 18, United States Code, Section 3142(g) provides factors that the Court must consider in determining whether to order Defendant detained pending trial. These factors include: (a) the nature and circumstances of the offense charged; (b) the weight of the evidence against Defendant; (c) Defendant's criminal history and characteristics; and (d) the danger that would be posed by Defendant's release to any particular individual or the community as a whole.

2. Defendant is currently charged by Indictment with one count of Conspiracy to Commit Murder for Hire, in violation of 18 U.S.C. § 1958, and one count of Murder for Hire, in violation of 18 U.S.C. §§ 1958 & 2.

3. According to an investigation by the St. Louis Metropolitan Police Department (SLMPD) and FBI, in the early morning hours of July 7, 2023, SLMPD officers were alerted to a “Person Down” in the alley of the 4400 block of Kennerly Avenue. There, responding officers discovered victim AW deceased after suffering multiple apparent gunshot wounds.

4. After learning victim AW’s cellphone number, investigators obtained call records and identified the cellphone numbers that communicated with victim AW’s cellphone in the hours leading up to her murder. One of those numbers belonged to Defendant, who investigators learned was victim AW’s son.

5. Investigators also obtained state-level search warrants for tower/area cellular data from three points critical to the investigation: (1) victim AW’s residence; (2) a point along the path victim AW’s device travelled from her residence to the location where her body was recovered, and (3) the place where her body was recovered. From that data, investigators were able to identify the co-Defendants, Eric Washington, and Justin Lee, based on cellular devices that were with victim AW’s cellular device at or near the same time at all three points. Investigators further determined that Defendant’s device communicated with both cellular devices associated with these co-Defendants throughout the day on July 6<sup>th</sup> into the early morning hours of July 7, 2023.

6. Investigators also learned that four days after victim AW was murdered, Defendant submitted a claim on a life insurance policy he had obtained in 2019. Victim AW was the insured on the policy and Defendant, owner of the policy, was listed as the sole beneficiary.

7. After being detained during the execution of the search warrant at 12249 Corrida Court, Defendant was questioned about his knowledge of victim AW’s murder. Defendant admitted to aiding and abetting the murder of his mother. The Defendant further admitted to attempting to collect the proceeds on victim AW’s life insurance policy after the murder. The FBI

forensic investigation of the cell phones utilized by Defendant and his accomplices corroborated Defendant's admissions to investigators.

8. The Defendant is charged with violent crimes, one of which carries a maximum penalty of death. Accordingly, the United States moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq. It is the government's position that the Defendant is a flight risk and a danger to the community.

9. Based on the statutory factors in 18 U.S.C. 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with crimes of violence. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant, as summarized above, is strong.

WHEREFORE, the Government requests that this Court order Defendant detained prior to trial, and further order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Ashley M. Walker  
ASHLEY M. WALKER #67175MO  
Assistant United States Attorney  
Thomas F. Eagleton Courthouse  
111 South Tenth Street, 20th Floor  
St. Louis, Missouri 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of this document was filed with the Court's electronic file management system for service upon all parties and counsel of record on October 19, 2023

s/Ashley M. Walker

ASHLEY M. WALKER, #67175MO

Assistant United States Attorney